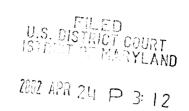
IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND (BALTIMORE DIVISION)



Plaintiff

v.

Plaintiff

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CINTERED

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CINTERED

*

V.

NATIONWIDE INSURANCE

COMPANY

Defendant

*

Defendant

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CINTERED

*

COMPANY

DEPUTY

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DEPUTY

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DEPUTY

JOINT MOTION TO MODIFY SCHEDULING ORDER

The parties, through undersigned counsel, hereby request to modify the Scheduling Order and for good cause state:

- 1. The Scheduling Order was issued on March 27, 2002. On April 19, the parties submitted a report to this Court regarding deposition hours and agreeing to have this matter submitted to an early settlement conference.
- 2. The early settlement conference is scheduled for June 18. However, the parties are currently engaging in settlement negotiations and mutually request that the deadlines set forth in the Scheduling Order be extended 60 days to give the parties an opportunity to resolve this matter before engaging in further discovery.
 - 3. No prior extension has been sought by either party.
 - 4. The extension will not prejudice either party.



WHEREFORE, the parties request that this Court amend the Scheduling Order by extending the deadlines set forth in the Scheduling Order by 60 days.

Respectfully submitted,

Paul V. Bennett

(Federal Bar No. 10324)

133 Defense Highway, Suite 209 Annapolis, Maryland 21401-7040

Tele: (410) 974-6000 Facsimile: (410) 224-4590 Attorney for Plaintiff

Patricia McHugh Lambert (Federal Bar No. 02539)

(Federal Bar No. 11872)

HODES, ULMAN, PESSIN & KATZ, P.A.

901 Dulaney Valley Road, Suite 400

Towson, Maryland 21204 Tele: (410) 938-8800 Fax: (410) 825-2493

Attorneys for Defendant

so ordered, this 25th day of 41

The Honorable William N. Nickerson

United States District Judge

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on this $3\frac{1}{2}$ day of April, 2002, a copy of the foregoing Joint Motion to Modify Scheduling Order was mailed, first-class, postage prepaid to:

Paul V. Bennett, Esquire Law Office of Paul V. Bennett 133 Defense Highway, Suite 209 Annapolis, Maryland 21401 Facsimile: (410) 224-4590